

# **Exhibit CCC**

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1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE SOUTHERN DISTRICT OF NEW YORK

3 -----x

4 EASTERN PROFIT CORPORATION LIMITED,

5           Plaintiff/Counterclaim Defendant,           Case No.

6           -against-                                   18-cv-2185

7 STRATEGIC VISION US, LLC,                           (JGK)

8           Defendant/Counterclaim plaintiff.

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13                           Karin MAISTRELLO

14                           NEW YORK, NEW YORK

15                           AUGUST 23, 2019

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22   REPORTED BY:   KATHLEEN T. KEILTY  
                  C.S.R. NO. 000755

23   FILE NO.:       AD0867C

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<div>1August 23, 2019</div> <div>2DIRECTIONS</div> <div>3(Continued)</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	<table><tr><th>NUMBER</th><th>QUESTION</th><th>PAGE</th><th>LINE</th></tr><tr><td>6.</td><td>At the end of the conversation, did you tell Mr. Podhaskie that you were going to resign as an ACA director?</td><td>65</td><td>15</td></tr><tr><td>7.</td><td>So my question to you is, did you initiate that conversation or did Mr. Podhaskie?</td><td>67</td><td>7</td></tr><tr><td>8.</td><td>So in the conversation where Daniel said something was going on with ACA, did you come -- did you start that conversation with Podhaskie and come to ask him a question or did Podhaskie come to you?</td><td>68</td><td>21</td></tr><tr><td>9.</td><td>Did he give you advice in this discussion?</td><td>76</td><td>2</td></tr><tr><td>10.</td><td>And I'm not going to ask about legal advice right now. I'm just going to say, during the conversation, did Mr. Podhaskie advise you to do anything? Yes or no.</td><td>78</td><td>2</td></tr><tr><td>11.</td><td>Did you take any actions as a result of your discussion with Mr. Podhaskie?</td><td>78</td><td>16</td></tr><tr><td>12.</td><td>Was the topic of your discussion with Mr. Podhaskie the problems that were happening with ACA?</td><td>98</td><td>5</td></tr></table> <div>Page 6</div>	NUMBER	QUESTION	PAGE	LINE	6.	At the end of the conversation, did you tell Mr. Podhaskie that you were going to resign as an ACA director?	65	15	7.	So my question to you is, did you initiate that conversation or did Mr. Podhaskie?	67	7	8.	So in the conversation where Daniel said something was going on with ACA, did you come -- did you start that conversation with Podhaskie and come to ask him a question or did Podhaskie come to you?	68	21	9.	Did he give you advice in this discussion?	76	2	10.	And I'm not going to ask about legal advice right now. I'm just going to say, during the conversation, did Mr. Podhaskie advise you to do anything? Yes or no.	78	2	11.	Did you take any actions as a result of your discussion with Mr. Podhaskie?	78	16	12.	Was the topic of your discussion with Mr. Podhaskie the problems that were happening with ACA?	98	5
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<div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	<div>11:46</div> <div>THE VIDEOGRAPHER: My name is Michael Bennett. I am your videographer and I represent Atkinson-Baker, Inc. of Glendale, California. I am a Notary Public in and for the State of New York. I am not financially interested in this action nor am I a relative or employee of any attorney of any of the parties.</div> <div>The date is August 23rd, 2019.</div> <div>The time is approximately 11:46 a.m.</div> <div>This deposition is taking place at the offices of Bryan Cave Leighton Paisner LLP, located at 1290 Avenue of the Americas, in New York, New York. This is Case No. 18-cv-2185, entitled Eastern Profit Corporation Limited, plaintiff and counterclaim defendant, versus Strategic Vision US, LLC, defendant and counterclaim plaintiff. The deponent is Karin Maistrello. This deposition is being taken on behalf of defendant/counterclaim plaintiff Strategic Vision US, LLC. Your court reporter is Kathleen Keilty with Atkinson-Baker, Inc., and I would ask</div> <div>11:47</div> <div>Page 7</div>																																
<div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	<div>11:48</div> <div>Q. Have you been deposed before?</div> <div>A. No. First time.</div> <div>Q. Okay. I'll ask you a series of questions about the case. I would just ask that you answer clearly. You know that you can't nod your head. You'll want to speak clearly so it's in the transcript. Do you understand that?</div> <div>A. Yes, I do.</div> <div>Q. All right. And if my question is unclear for any reason or you don't understand it, please just let me know and I'll rephrase it or we'll work it out. Okay?</div> <div>A. Okay.</div> <div>Q. Could you please state your current residential address.</div> <div>11:49</div> <div>A. My address is 15-17 Gifford Avenue, Jersey City, New Jersey 07304.</div> <div>Q. What is your age?</div> <div>A. Twenty-nine.</div> <div>Q. And I understand you're an Italian citizen?</div> <div>A. I am.</div> <div>Q. In the US on a visa of some kind?</div> <div>A. Correct.</div> <div>MR. GREIM: Object to the form and</div> <div>Page 9</div>																																

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<p>1 to relevancy. 11:49</p> <p>2 Q. Tell us about, if you could -- I'm just</p> <p>3 going to ask you some background questions. I take</p> <p>4 it you've got some sort of educational training.</p> <p>5 Could you just walk us through your, you know, post</p> <p>6 high school training that you've had.</p> <p>7 A. I started at university. I studied in</p> <p>8 Rome for three years, interpreting and translation.</p> <p>9 After that, I moved to China. I</p> <p>10 attended Nankai University. I got my first Master's</p> <p>11 Degree in Chinese literature and my second Master's</p> <p>12 Degree in linguistics and applied linguistics.</p> <p>13 Q. Okay. What about after that? Anything</p> <p>14 else?</p> <p>15 A. As far as studying? 11:50</p> <p>16 Q. Yes.</p> <p>17 A. Nothing else.</p> <p>18 Q. Okay. What was your -- so it sounds</p> <p>19 you like your last educational degree was from Nankai</p> <p>20 University?</p> <p>21 A. That is correct.</p> <p>22 Q. Let's just say starting with from that</p> <p>23 point forward, could you just tell us your employment</p> <p>24 history.</p> <p>25 A. After moving to the States, I was</p> <p style="text-align: right;">Page 10</p>	<p>1 A. Italian, German, French, English, 11:51</p> <p>2 Hungarian, Chinese.</p> <p>3 Q. Okay. Now, let's see, you said that</p> <p>4 you've been working for Golden Spring since</p> <p>5 February 2018?</p> <p>6 A. That's correct.</p> <p>7 Q. During that time, have you had any</p> <p>8 other jobs?</p> <p>9 A. No.</p> <p>10 Q. Have you been the director or officer</p> <p>11 of any other entity?</p> <p>12 A. Can I ask you to rephrase?</p> <p>13 Q. Sure.</p> <p>14 Since February of 2018, let's say from</p> <p>15 then to today, have you been a director or officer of 11:52</p> <p>16 any other entity?</p> <p>17 MS. TESKE: Object to the form.</p> <p>18 You can answer.</p> <p>19 A. I was director of ACA from January 1st</p> <p>20 to July 26th of 2019.</p> <p>21 Q. Any entities other than ACA?</p> <p>22 MS. TESKE: Object and direct the</p> <p>23 witness not to answer.</p> <p>24 MR. GREIM: All right.</p> <p>25 Q. What were your duties as a director of</p> <p style="text-align: right;">Page 12</p>
<p>1 employed by Golden Spring New York, and I've been 11:50</p> <p>2 working there since then.</p> <p>3 Q. Okay. Now when was that that you moved</p> <p>4 to the United States and started working for Golden</p> <p>5 Spring?</p> <p>6 A. I started working for Golden Spring in</p> <p>7 February 2018.</p> <p>8 Q. Is that also when you moved to the</p> <p>9 United States?</p> <p>10 A. I moved slightly earlier.</p> <p>11 Q. Did you come here thinking you were</p> <p>12 going to work for Golden Spring or did you move here</p> <p>13 and then find Golden Spring as a place to work?</p> <p>14 MR. GREIM: Object and direct the</p> <p>15 witness not to answer. 11:51</p> <p>16 What's the relevance?</p> <p>17 MR. GREIM: I am just trying to</p> <p>18 understand the witness's background.</p> <p>19 These are typical questions.</p> <p>20 MS. TESKE: I've given you some</p> <p>21 leeway, but none of this is relevant to</p> <p>22 the case.</p> <p>23 MR. GREIM: Okay.</p> <p>24 Q. So what languages are you proficient</p> <p>25 in?</p> <p style="text-align: right;">Page 11</p>	<p>1 ACA? 11:53</p> <p>2 A. I was director and I did not have any</p> <p>3 specific duty.</p> <p>4 Q. Oh, I forgot to ask you this before.</p> <p>5 Have you done any work for hire on the side?</p> <p>6 I asked you about where you've been</p> <p>7 employed. I asked you about being an officer or</p> <p>8 director. I'm going to go back to the same period.</p> <p>9 From February 2018 to today, have you done any other</p> <p>10 work on side for hire for any other client.</p> <p>11 MS. TESKE: I am going to direct</p> <p>12 the witness it's a yes or no question and</p> <p>13 that's it.</p> <p>14 A. No.</p> <p>15 Q. How did you to become a director of 11:54</p> <p>16 ACA?</p> <p>17 A. I was asked by William to join ACA and</p> <p>18 I gladly accepted.</p> <p>19 Q. Okay. William who?</p> <p>20 A. William Je, spelled J-e.</p> <p>21 Q. Did you know Mr. Je previously?</p> <p>22 A. Yes.</p> <p>23 Q. How did you know him?</p> <p>24 A. I was introduced by William -- to</p> <p>25 William by Mrs. Wang as a person of trust, and I met</p> <p style="text-align: right;">Page 13</p>

4 (Pages 10 to 13)

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<p>1 him several times. 11:54</p> <p>2 Q. You met him several times before he</p> <p>3 offered the directorship to you?</p> <p>4 A. That's correct.</p> <p>5 Q. Now, when you said Mrs. Wang or</p> <p>6 Ms. Wang, are you referring to Yvette Wang?</p> <p>7 A. Yes, I'm referring to her.</p> <p>8 Q. The person sitting at this table?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. When did Ms. Wang introduce you</p> <p>11 to Mr. Je?</p> <p>12 A. I don't remember.</p> <p>13 Q. Let me ask you this way. If you became</p> <p>14 a director on January 1, 2019, how long before that</p> <p>15 had you been introduced to Mr. Je by Ms. Wang? 11:55</p> <p>16 A. I would say several months.</p> <p>17 Q. Maybe here's another way to look at it.</p> <p>18 You came to the US or I guess you started with Golden</p> <p>19 Spring in February of 2018. How long after that time</p> <p>20 did Ms. Wang introduce you to Mr. Je?</p> <p>21 MS. TESKE: I object. Asked and</p> <p>22 answered.</p> <p>23 If you have a different answer go</p> <p>24 ahead and provide it.</p> <p>25 A. I really don't remember.</p> <p style="text-align: right;">Page 14</p>	<p>1 (Whereupon, the record is read.) 11:57</p> <p>2 MS. TESKE: Yeah, you can call the</p> <p>3 judge.</p> <p>4 MR. GREIM: All right. Let's go</p> <p>5 off the record for a second:</p> <p>6 THE VIDEOGRAPHER: We are off the</p> <p>7 record, 11:56 a.m.</p> <p>8 (Whereupon, there is a discussion off</p> <p>9 the record.)</p> <p>10 Whereupon, the following teleconference</p> <p>11 is held with the Hon. Debra Freeman:)</p> <p>12 MR. GREIM: So, your Honor, this</p> <p>13 is the issue. We have just really begun.</p> <p>14 I am laying the foundation of</p> <p>15 Ms. Maistrello coming on to ACA as a 12:02</p> <p>16 director. I've asked her if somebody</p> <p>17 invited her on. It was William Je. I've</p> <p>18 asked her who introduced her to William</p> <p>19 Je, it was Ms. Yvette Wang, and my</p> <p>20 question was, you know, who introduced</p> <p>21 you to Evette Wang or I think it was how</p> <p>22 did you meet Evette Wang and we got an</p> <p>23 instruction not to answer that question.</p> <p>24 And, your Honor, I'm just trying to lay</p> <p>25 the ground work.</p> <p style="text-align: right;">Page 16</p>
<p>1 Q. How is it that you came to meet 11:55</p> <p>2 Mrs. Wang?</p> <p>3 MS. TESKE: Object and direct the</p> <p>4 witness not to answer.</p> <p>5 MR. GREIM: On what basis?</p> <p>6 MS. TESKE: Judge Freeman was very</p> <p>7 specific about the lines of inquiry that</p> <p>8 you were entitled to pursue in this</p> <p>9 deposition, and this is way outside the</p> <p>10 bounds and I've given you lots of room.</p> <p>11 MR. GREIM: Okay. I'm afraid -- I</p> <p>12 hate to do this too early, but these are</p> <p>13 just foundational questions to a witness</p> <p>14 being able to explain things about ACA, 11:56</p> <p>15 about ACA's relationship to Eastern</p> <p>16 Profit. We know that Ms. Wang is serving</p> <p>17 as attorney in fact for Eastern Profit.</p> <p>18 If we can't ask this, I don't know -- I</p> <p>19 don't know really we can ask any</p> <p>20 questions. So I'm afraid we're going to</p> <p>21 have to dial up on this question.</p> <p>22 MS. TESKE: Can you repeat the</p> <p>23 question?</p> <p>24 MR. GREIM: I'll just ask the</p> <p>25 reporter to read back the question.</p> <p style="text-align: right;">Page 15</p>	<p>1 Remember, Yvette Wang is the 12:02</p> <p>2 Golden Spring person who is a -- the</p> <p>3 attorney in fact for Eastern Profit, and</p> <p>4 so I want to know how it is that</p> <p>5 Eastern -- an Eastern Profit person has</p> <p>6 introduced a director of ACA to ACA.</p> <p>7 MS. TESKE: Your Honor, this is</p> <p>8 Erin Teske. Good afternoon. I apologize</p> <p>9 for the call. We spoke for about -- I</p> <p>10 think for about 90 minutes of our</p> <p>11 conversation yesterday was about Karin</p> <p>12 Maistrello and the deposition and the</p> <p>13 scope of the documents and testimony</p> <p>14 requests that were in the subpoena to 12:03</p> <p>15 Ms. Maistrello, and at the end of that</p> <p>16 conversation you gave -- your Honor gave</p> <p>17 very explicit instructions that the two</p> <p>18 lines of inquiry that were permitted --</p> <p>19 to be permitted at this deposition were</p> <p>20 the loan from ACA to Eastern Profit and</p> <p>21 the relationship between ACA and Eastern</p> <p>22 Profit. And I've allowed Mr. Greim to</p> <p>23 ask a bunch of background questions about</p> <p>24 Ms. Maistrello, including, you know, from</p> <p>25 whom she accepted her position at ACA and</p> <p style="text-align: right;">Page 17</p>

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<p>1 the defense that you're trying to raise 12:12</p> <p>2 here.</p> <p>3 MR. GREIM: And, your Honor, just</p> <p>4 to be clear, we're going to ask about her</p> <p>5 resignation as well, the thing that makes</p> <p>6 ACA not reachable.</p> <p>7 MS. TESKE: And I have no</p> <p>8 objection to this.</p> <p>9 MR. GREIM: Okay.</p> <p>10 THE COURT: All right, good.</p> <p>11 MR. GREIM: All right.</p> <p>12 THE COURT: Carry on, then.</p> <p>13 MR. GREIM: Thank you.</p> <p>14 MS. TESKE: Thank you.</p> <p>15 MR. GRENDI: Thank you, your 12:13</p> <p>16 Honor.</p> <p>17 THE COURT: You're welcome.</p> <p>18 (Whereupon, the teleconference</p> <p>19 with the Hon. Debra Freeman concludes.)</p> <p>20 THE VIDEOGRAPHER: We are back on</p> <p>21 the record at 12:13 p.m.</p> <p>22 (Whereupon, the record is read as</p> <p>23 follows:</p> <p>24 "Question: How is it that you came to</p> <p>25 meet Mrs. Wang?")</p> <p>Page 26</p>	<p>1 Q. Tell me what you remember Mr. Je saying 12:16</p> <p>2 to you about the offer.</p> <p>3 A. We didn't speak much. He just told me</p> <p>4 that he was interested in some business in the US,</p> <p>5 and he asked whether I wanted to join.</p> <p>6 Q. What did he say the business was?</p> <p>7 A. Fund investment.</p> <p>8 Q. Now did you have a background in fund</p> <p>9 investment?</p> <p>10 A. I do not.</p> <p>11 Q. Did you have any questions for Mr. Je</p> <p>12 about what this role would entail?</p> <p>13 A. No.</p> <p>14 Q. Why not?</p> <p>15 A. I trusted his judgment. 12:16</p> <p>16 Q. Why did you trust his judgment?</p> <p>17 MS. TESKE: Object to the form.</p> <p>18 You can answer. You can answer.</p> <p>19 A. I trust him, therefore, I trust his</p> <p>20 judgment.</p> <p>21 Q. Okay. I guess let me rephrase it.</p> <p>22 What is it about him that made you</p> <p>23 trust his judgement.</p> <p>24 MS. TESKE: Object to the form.</p> <p>25 You can answer.</p> <p>Page 28</p>
<p>1 A. I met her for the first time at a job 12:14</p> <p>2 interview and that's how we met.</p> <p>3 Q. Now, you said you met William Je</p> <p>4 several times before becoming a director.</p> <p>5 A. That's correct.</p> <p>6 Q. Did you understand when you were</p> <p>7 meeting him what his role was with ACA?</p> <p>8 A. We never spoke about ACA before.</p> <p>9 Q. But I presume that you did speak about</p> <p>10 ACA when he offered you a directorship; is that</p> <p>11 right?</p> <p>12 A. Briefly.</p> <p>13 Q. And was that discussion in person or</p> <p>14 over the phone?</p> <p>15 A. In person. 12:15</p> <p>16 Q. Where did that happen?</p> <p>17 A. That happened at our office.</p> <p>18 Q. I'm sorry. Who's office?</p> <p>19 A. Golden Spring New York's office.</p> <p>20 Q. Your testimony again is that it was</p> <p>21 several months -- well, actually let me ask you.</p> <p>22 When -- how long before January 1st,</p> <p>23 2019 did that discussion happen?</p> <p>24 MR. GRENDI: Object to the form.</p> <p>25 A. Probably a month before.</p> <p>Page 27</p>	<p>1 A. He was introduced to me by someone I 12:17</p> <p>2 trust and that's how it works for me, the person who</p> <p>3 introduced us trusted him and I got to trust him.</p> <p>4 Q. So did you tell him yes on the spot?</p> <p>5 A. I did.</p> <p>6 Q. Did you ask him what your duties would</p> <p>7 be?</p> <p>8 A. Briefly.</p> <p>9 Q. What did he say?</p> <p>10 A. Again, he was interested in some</p> <p>11 business in the US and was asking if I could help</p> <p>12 find some investors.</p> <p>13 Q. Okay.</p> <p>14 A. Some --</p> <p>15 Q. Go ahead. 12:17</p> <p>16 A. I'm sorry. Some projects to invest in.</p> <p>17 Q. So if I understand correctly, he told</p> <p>18 you that your duties would be finding projects for</p> <p>19 ACA to invest in?</p> <p>20 MS. TESKE: Object to the form.</p> <p>21 You can answer.</p> <p>22 A. Yes.</p> <p>23 Q. Did he say -- did he tell you what</p> <p>24 sorts of projects ACA invested in?</p> <p>25 A. No, he did not.</p> <p>Page 29</p>

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<p>1 Q. So, like, for example, construction 12:18 2 projects, renovation projects, did he give you any 3 kind of detail what he meant by projects? 4 A. Again, no, he did not. 5 Q. Is ACA a hedge fund? 6 A. I do not know. 7 Q. Did Mr. Je tell you who you would be 8 reporting to, if anyone, as a director? 9 A. No, he didn't. 10 Q. Did he tell you who else was involved 11 with the company? 12 A. No, he did not. 13 Q. Did he tell you if there were any other 14 directors? 15 A. No, he did not. 12:19 16 Q. Did he tell you whether he was a 17 director? 18 A. No, he did not. 19 Q. Did you have any concerns about working 20 for ACA? 21 A. No. 22 MS. TESKE: Object to the form. 23 You can answer. 24 A. No. 25 Q. When was the first time you heard of</p> <p style="text-align: right;">Page 30</p>	<p>1 Q. Did he refer you to any attorney to 12:20 2 advise you on that question? 3 A. No. 4 Q. Okay. Let's talk about your time with 5 ACA. First of all, as director, did you have an 6 office somewhere? 7 A. No, I did not. 8 Q. Did ACA have an office in the United 9 States anywhere? 10 A. I do not know. 11 Q. Between the time of your appointment 12 and the time that you are saying that you resigned, 13 did you do any work as a director of ACA? 14 A. No, I didn't. 15 Q. Did you find any projects for Mr. Je? 12:21 16 A. No, I didn't. 17 Q. Did you try to find projects for 18 Mr. Je? 19 A. No, I didn't. 20 Q. Did Mr. Je ever ask you why you were 21 not finding projects? 22 A. No. 23 Q. Did you ever talk to Mr. Je about your 24 role with ACA after that conversation? 25 MR. GRENDI: Object to the form.</p> <p style="text-align: right;">Page 32</p>
<p>1 ACA? 12:19 2 A. When he asked me to become director. 3 Q. Did you do any research to learn more 4 about what ACA was? 5 A. I did not. 6 Q. At any time after your discussion with 7 Mr. Je, did you do any research to determine what ACA 8 was? 9 A. No, I did not. 10 Q. Did you understand what jurisdiction 11 ACA was registered in? 12 MS. TESKE: Object to the form of 13 the question. 14 You can answer. 15 A. I don't answer it -- I'm sorry. I 12:20 16 didn't understand the question. 17 Q. Did Mr. Je tell you where ACA was 18 registered? 19 A. No. 20 Q. Did he tell you what country or state 21 had jurisdiction over ACA and its directors? 22 MS. TESKE: Object to the form -- 23 MR. GRENDI: Object to the form. 24 MS. TESKE: -- of the question. 25 A. No.</p> <p style="text-align: right;">Page 31</p>	<p>1 MS. TESKE: Object to the form. 12:22 2 You can answer. 3 A. No. 4 Q. Let's be clear. There was an 5 objection. I'm going to make sure that this is clear 6 for the record. 7 So is it your testimony that after the 8 in-person meeting where Mr. Je offered the 9 directorship to you, you never spoke with Mr. Je 10 again about your work as an ACA director? 11 A. That's correct. 12 Q. Okay. I'm going to broaden the 13 question now. 14 After the discussion with Mr. Je where 15 he made the offer to you, did you ever discuss your 12:22 16 work as an ACA director with any other person? 17 A. No, I didn't. 18 Q. Did you ever discuss it with Yvette 19 Wang? 20 A. I did not. 21 Q. Were you ever paid for your work as a 22 director? 23 A. No. 24 Q. Did you sign any document appointing 25 you as a director?</p> <p style="text-align: right;">Page 33</p>

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<p>1 saying that I would like to resign, so he was 12:39 2 definitely expecting it. 3 Q. When did you write that email? 4 A. On the same day, so July 26th. 5 Q. Okay. At what time? 6 A. I don't remember. 7 Q. Do you have a copy of that email still? 8 A. I do. 9 Q. I would like to ask that you produce 10 that. 11 And I'll say it on the record now, 12 we'll talk about it because this is really something 13 for me and your counsel, but I would like, if I 14 could, to have the electronic version of the emails 15 and responses. 12:40 16 MS. TESKE: Follow up with me, if 17 you could. I'm taking notes, but just in 18 case, just follow up with me in an email 19 after. 20 MR. GREIM: Very good. 21 Q. So when you told Mr. Je, you would like 22 to resign in the prior email that we don't have with 23 us here today, what was his response? 24 MS. TESKE: Object to the form. 25 But you can answer.</p> <p style="text-align: right;">Page 46</p>	<p>1 highlighted in plaintiff Exhibit 1. Do you see that? 12:42 2 A. I do. 3 Q. Why is that? 4 A. 'Cause when I did the search in my 5 email everything that comes with that "William" gets 6 highlighted. 7 Q. When you did that search, how many 8 emails with William Je did you find in your inbox? 9 MS. TESKE: Object to the form. 10 A. I don't know. 11 Q. One or two or more than that? 12 MS. TESKE: Object to the form. 13 A. I really don't know. 14 Q. Were they all listed together there 15 when you ran your search? 12:42 16 MS. TESKE: Object to the form. 17 A. By typing William, all the emails with 18 "William" come up but not necessarily this William. 19 Q. Who drafted the resignation letter? 20 A. William did. 21 Q. Did he send this to you by email? 22 A. He did. 23 Q. Is that your signature? And I'm 24 directing you now to Exhibit 2. Is that your 25 signature on the line?</p> <p style="text-align: right;">Page 48</p>
<p>1 A. Okay. 12:41 2 Q. Is that literally what the email said? 3 A. I don't remember literally, but that 4 was definitely the meaning. 5 Q. Did he tell you that a new director 6 would need to be appointed to fill your place? 7 A. No. 8 MS. TESKE: Object to the form. 9 Q. Do you know whether a new director 10 needs to be appointed to take your place? 11 A. No, I don't. 12 Q. Are you aware of any other directors or 13 officers of ACA who are in the United States? 14 A. No, I'm not. 15 Q. How often does Mr. Je come to the 12:41 16 United States? 17 MS. TESKE: Object to the form. 18 Answer if you know. 19 A. I don't know. 20 Q. Your testimony is that you've met him 21 in person several times, though, in 2019? 22 A. Yes. 23 MS. TESKE: Object to the form, 24 but go ahead. 25 Q. I notice that the name William is</p> <p style="text-align: right;">Page 47</p>	<p>1 A. Yes, it is. 12:43 2 Q. Did you review this document before you 3 signed it? 4 A. Yes, I did. 5 Q. Did you make any changes to it? 6 A. I did not. 7 Q. Do you know whether Mr. Je took any 8 steps, any further steps to make your resignation 9 effective? 10 MS. TESKE: Object to the form. 11 You can answer. 12 A. I don't know. 13 Q. Do you know whether he filed this with 14 the requisite authorities in Hong Kong? 15 MS. TESKE: Object to the form. 12:44 16 You can answer. 17 A. I don't know. 18 Q. Did -- have you asked Mr. Je if he has 19 taken any steps with your resignation letter? 20 A. I have not. 21 Q. Do you know whether under either Hong 22 Kong law or the bylaws and formation documents of the 23 company you have effectively resigned -- 24 MS. TESKE: Object. 25 Q. -- from ACA?</p> <p style="text-align: right;">Page 49</p>

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<p>1 A. I have not. 12:51</p> <p>2 Q. So sitting here today, you can't tell</p> <p>3 us anything about Eastern Profit; is that correct?</p> <p>4 A. That's correct.</p> <p>5 Q. You don't know what it does?</p> <p>6 A. I have no idea.</p> <p>7 Q. Did you realize that we're here in the</p> <p>8 case of Eastern Profit versus Strategic Vision?</p> <p>9 MS. TESKE: Object to the form.</p> <p>10 You can answer.</p> <p>11 A. Yes, I did.</p> <p>12 Q. So other than hearing that it's in the</p> <p>13 title of the case, you've never heard of Eastern</p> <p>14 Profit?</p> <p>15 A. I have not. 12:51</p> <p>16 Q. Have you ever heard of Strategic</p> <p>17 Vision?</p> <p>18 A. I have not.</p> <p>19 Q. And you understand it's in the title of</p> <p>20 the case that we're here under, correct?</p> <p>21 A. That's correct.</p> <p>22 Q. So you've never spoken to Yvette Wang</p> <p>23 about Strategic Vision?</p> <p>24 A. No, I have not.</p> <p>25 Q. You've never spoken to Yvette Wang</p> <p style="text-align: right;">Page 54</p>	<p>1 are a director? 12:54</p> <p>2 MS. TESKE: Object to the form.</p> <p>3 A. Can you please ask it again.</p> <p>4 Q. Is ACA Capital Group Limited the</p> <p>5 official name of the entity of which you are a</p> <p>6 director?</p> <p>7 MS. TESKE: Same objection.</p> <p>8 You can answer.</p> <p>9 A. I am not sure.</p> <p>10 Q. So you'll see the first two pages are a</p> <p>11 notice of subpoena.</p> <p>12 A. Mm-hmm.</p> <p>13 Q. If you turn to page 3, you'll see the</p> <p>14 subpoena itself. Do you see that?</p> <p>15 A. I do. 12:55</p> <p>16 MS. TESKE: Object to the form.</p> <p>17 You can answer.</p> <p>18 Q. And do you see about a quarter of the</p> <p>19 way down it says "To"?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And what does it say on that</p> <p>22 line, could you read that, please?</p> <p>23 A. "ACA Capital Group Limited to be served</p> <p>24 to its director, Karin Maistrello 17 Gifford</p> <p>25 Apartment 5F, Jersey City, New Jersey, 07304."</p> <p style="text-align: right;">Page 56</p>
<p>1 about Eastern Profit? 12:52</p> <p>2 A. No, I have not.</p> <p>3 (Whereupon, Maistrello Exhibit 3,</p> <p>4 subpoena issued to ACA Capital Group Limited,</p> <p>5 is marked for identification, as of this</p> <p>6 date.)</p> <p>7 (Whereupon, Maistrello Exhibit 4,</p> <p>8 subpoena issued to Karin Maistrello, is marked</p> <p>9 for identification, as of this date.)</p> <p>10 Q. I'm going to hand you what we're</p> <p>11 marking as Exhibits 3 and 4.</p> <p>12 Please take a look at Exhibit 3.</p> <p>13 A. Which one is that?</p> <p>14 MR. GRENDI: Which one is that,</p> <p>15 they look the same. 12:54</p> <p>16 MR. GREIM: They're not. You'll</p> <p>17 see it's a bit different.</p> <p>18 MS. TESKE: Which one is 3?</p> <p>19 MR. GREIM: Exhibit 3 is the ACA.</p> <p>20 MS. TESKE: Thank you.</p> <p>21 Q. So do you see that Exhibit 3 is a</p> <p>22 subpoena to ACA Capital Group Limited?</p> <p>23 A. Mm-hmm, yes.</p> <p>24 Q. By the way, is ACA Capital Group</p> <p>25 Limited the official name of the entity of which you</p> <p style="text-align: right;">Page 55</p>	<p>1 Q. Is that your address? 12:55</p> <p>2 A. It is.</p> <p>3 Q. And were you served with this subpoena</p> <p>4 at that address?</p> <p>5 MS. TESKE: Object to the form.</p> <p>6 You can answer.</p> <p>7 A. Yes.</p> <p>8 Q. What did you do after you were served</p> <p>9 with this subpoena?</p> <p>10 MS. TESKE: Object if the form.</p> <p>11 You can answer it.</p> <p>12 A. I gave it to our lawyer.</p> <p>13 Q. And was that Ms. Teske sitting here</p> <p>14 next to you?</p> <p>15 A. It was not. 12:56</p> <p>16 Q. Who was that?</p> <p>17 A. Daniel Podhaskie.</p> <p>18 Q. When you say "our lawyer," do you mean</p> <p>19 Golden Spring's lawyer?</p> <p>20 A. Golden Spring's lawyer.</p> <p>21 Q. Now, don't -- I'm not going to ask you</p> <p>22 for the content of your discussion. My only question</p> <p>23 is, did you ask Mr. Podhaskie for legal advice?</p> <p>24 A. I asked him --</p> <p>25 MS. TESKE: No. Whoa, whoa, whoa,</p> <p style="text-align: right;">Page 57</p>

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<p>1           whoa. <span style="float: right;">12:56</span></p> <p>2           MR. GRENDI: Object. Yes or no, yeah.</p> <p>3           Q. Yes or no. It's a yes or no answer.</p> <p>4           MS. TESKE: If you thought you</p> <p>5           were seeking legal advice, say yes. If</p> <p>6           not, you can say no.</p> <p>7           A. Then no.</p> <p>8           Q. All right. Then what did you discuss</p> <p>9           with him?</p> <p>10          A. I asked him what should I do with</p> <p>11          these.</p> <p>12          Q. And what did he say?</p> <p>13          MS. TESKE: No, no, no, no, no.</p> <p>14          MR. GRENDI: Yeah.</p> <p>15          MS. TESKE: That sounds like -- <span style="float: right;">12:57</span></p> <p>16          MR. GRENDI: Misunderstanding.</p> <p>17          MS. TESKE: No. That's sounds</p> <p>18          like a misunderstanding, so I'm going to</p> <p>19          direct the witness not to answer.</p> <p>20          MR. GREIM: Okay.</p> <p>21          Q. What did you do with these after you</p> <p>22          showed them to Mr. Podhaskie?</p> <p>23          A. Nothing.</p> <p>24          Q. I'm sorry. Did you give them to him or</p> <p>25          did you keep them?</p> <p style="text-align: right;">Page 58</p>	<p>1           You can answer. <span style="float: right;">12:58</span></p> <p>2           A. Yes. I believe so.</p> <p>3           Q. So do you recall receiving two</p> <p>4           subpoenas, one for you, Karin Maistrello and the</p> <p>5           other for ACA to be served on you?</p> <p>6           MS. TESKE: Object to the form.</p> <p>7           You can answer.</p> <p>8           A. Yes.</p> <p>9           Q. And when you said that you gave them to</p> <p>10          Mr. Podhaskie. Did you give him both subpoenas?</p> <p>11          A. Yes.</p> <p>12          Q. And you didn't keep a copy of either</p> <p>13          subpoena, correct?</p> <p>14          A. Correct.</p> <p>15          Q. Did you -- you'll see that on the back <span style="float: right;">12:59</span></p> <p>16          of the one that's addressed to you, this is</p> <p>17          Exhibit 4, if you look, there's an Exhibit A. Do you</p> <p>18          see it lists about eight different document items?</p> <p>19          A. Yes.</p> <p>20          Q. Did you take any steps to search for</p> <p>21          these documents?</p> <p>22          MS. TESKE: Object to the form.</p> <p>23          You can answer.</p> <p>24          A. No.</p> <p>25          Q. Let me ask you this. When was the</p> <p style="text-align: right;">Page 60</p>
<p>1           A. I gave them to him. <span style="float: right;">12:57</span></p> <p>2           Q. Did you keep a copy for yourself?</p> <p>3           A. I did not.</p> <p>4           Q. And just to be clear, let's also take a</p> <p>5           look at Exhibit 4. Do you recognize Exhibit 4?</p> <p>6           A. I do not.</p> <p>7           Q. Okay. You'll see that under where it</p> <p>8           says, "Please take notice," do you see that it says</p> <p>9           that "The defendant/counterclaim plaintiff shall</p> <p>10          cause the attached subpoena directed to nonparty</p> <p>11          Karin Maistrello to be served after service of this</p> <p>12          notice." Do you see that?</p> <p>13          A. Yes, I do.</p> <p>14          Q. And then if you turn two pages, you see</p> <p>15          a subpoena? <span style="float: right;">12:58</span></p> <p>16          MS. TESKE: Object to the form.</p> <p>17          A. Yes.</p> <p>18          Q. And do you see the "To" line?</p> <p>19          A. I see it.</p> <p>20          Q. Could you read who that's to?</p> <p>21          A. "Karin Maistrello, 17 Gifford Avenue,</p> <p>22          Apartment 5F, Jersey City, New Jersey, 07304."</p> <p>23          Q. Is this the subpoena that did you</p> <p>24          received?</p> <p>25          MS. TESKE: Objection to form.</p> <p style="text-align: right;">Page 59</p>	<p>1           first time that you saw Exhibits 3 and 4. <span style="float: right;">01:00</span></p> <p>2           MS. TESKE: Object to the form.</p> <p>3           A. I don't know. To be honest, when I</p> <p>4           received this, I didn't read them.</p> <p>5           Q. Did you read them before you gave them</p> <p>6           to Mr. Podhaskie?</p> <p>7           A. I did not.</p> <p>8           Q. Had you seen Exhibits 3 and 4 before</p> <p>9           the time you were served with process at your house?</p> <p>10          MS. TESKE: Object to the form.</p> <p>11          You can answer.</p> <p>12          A. No.</p> <p>13          Q. Why did you choose to resign?</p> <p>14          Well, let me strike that.</p> <p>15          Why did you resign on July 26th, 2019? <span style="float: right;">01:01</span></p> <p>16          A. I heard from Daniel that something was</p> <p>17          going on with ACA, something I --</p> <p>18          MS. TESKE: Whoa, whoa, whoa,</p> <p>19          whoa, whoa, whoa, whoa, whoa.</p> <p>20          MR. GRENDI: Yeah.</p> <p>21          MS. TESKE: Conversations between</p> <p>22          you and Daniel are privileged and you are</p> <p>23          directed not to answer with respect to</p> <p>24          those conversations.</p> <p>25          MR. GREIM: I would say this, if</p> <p style="text-align: right;">Page 61</p>

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<p>1 Mr. Podhaskie is giving legal advice, 01:01 2 it's one thing. If Mr. Podhaskie is 3 telling her that a subpoena is coming, 4 that is entirely another thing. 5 Q. So I'm going to ask you -- 6 MS. TESKE: No. Well -- okay. 7 You -- 8 MR. GREIM: I'll make my record -- 9 MS. TESKE: That's fine. 10 MR. GREIM: -- and you can listen 11 and you can... 12 Q. So we'll take this in steps, okay? 13 MS. TESKE: Don't answer the 14 question. 15 Q. Did Mr. Podhaskie -- I'm going to ask 01:01 16 you about things that Podhaskie told you, not about 17 advice he gave you, okay? There's a difference. 18 What did Mr. Podhaskie tell you was 19 going on with ACA? 20 MS. TESKE: Object to the form of 21 the question. Direct the witness not to 22 answer. 23 I need -- if you can be really 24 specific in what you're asking. 25 MR. GREIM: Okay.</p> <p>Page 62</p>	<p>1 Q. Did Mr. Podhaskie ever give you advice 01:03 2 relating to ACA? 3 MS. TESKE: Object to the form. 4 You can answer. 5 A. No. 6 Q. What did Mr. Podhaskie tell you was 7 going on with ACA? 8 MS. TESKE: Object to the form. 9 Direct you not to answer. 10 I need to know more about the 11 context in which this communication 12 happened before she can answer that 13 question. 14 MR. GREIM: Okay. We'll keep 15 going. We'll see, we'll pick around the 01:03 16 edges here. 17 Q. Just go slowly, give your counsel a 18 chance to object if she wants to, okay? 19 Did Mr. Podhaskie -- when you spoke 20 with Mr. Podhaskie, was it over the phone or in 21 person? 22 MS. TESKE: You can answer. 23 A. In person. 24 Q. Where did the conversation take place? 25 MS. TESKE: You can answer.</p> <p>Page 64</p>
<p>1 MS. TESKE: And she can tell me 01:02 2 and I can decide whether or not that's an 3 attorney-client privileged communication. 4 MR. GREIM: We'll see. We'll find 5 a way. 6 Q. Let's be very careful here, okay. I 7 don't want you to waive any privilege. 8 When can was the discussion with 9 Mr. Podhaskie that you were starting to tell us 10 about? 11 A. I don't remember. 12 Q. Was it on July 26th? 13 A. I don't remember. 14 Q. Was it on July 25th? 15 A. I do not remember. 01:02 16 Q. Does Mr. Podhaskie -- did you 17 understand Mr. Podhaskie to be counsel to ACA? 18 MS. TESKE: Object to the form. 19 You can answer. 20 A. No. 21 Q. Did you ever ask Mr. Podhaskie for 22 legal advice relating to ACA? 23 MS. TESKE: Object to the form. 24 You can answer. 25 A. No.</p> <p>Page 63</p>	<p>1 A. At our office. 01:04 2 Q. What time of day was it? 3 A. I don't remember. 4 Q. Who else was present? 5 A. Just the two of us. 6 Q. Was Yvette Wang present? 7 A. She was not. 8 Q. Without getting into any legal 9 advice, did Mr. Podhaskie tell you that he had spoken 10 with William Je? 11 MS. TESKE: Object to the form of 12 the question and direct the witness not 13 to answer. 14 Q. Did Mr. Podhaskie -- okay. 15 Let me ask you this. At the end of 01:05 16 the conversation, did you tell Mr. Podhaskie that you 17 were going to resign as an ACA director? 18 MS. TESKE: Object to the form of 19 the question and direct the witness not 20 to answer. 21 MR. GREIM: The problem is that's 22 a yes or no answer. 23 MS. TESKE: But it's a yes or no 24 answer about what she told her company's 25 lawyer in a conversation where it was</p> <p>Page 65</p>

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<p>1 just the two of them about an issue in 01:05 2 which she may very well have been seeking 3 legal advice whether or not, you know, 4 she understands the scope of that or not, 5 and she's a Golden Spring employee who 6 went to the only attorney she knows, 7 Golden Spring's attorney, to talk about a 8 legal document and you want to inquire 9 about those conversations. And I just 10 can't give you a lot of leeway there. 11 MR. GREIM: But the problem is, 12 though, that it's incumbent upon the 13 attorney -- not every lawyer-client 14 discussion is protected by the privilege, 15 and if she's coming to him as the ACA 01:06 16 director and he's not counsel for ACA -- 17 MS. TESKE: It doesn't matter. 18 MR. GREIM: -- it's incumbent upon 19 him to say I'm counsel for Golden Spring. 20 But we don't need to do this on the 21 record. I understand your objection. 22 Q. Let me ask you this. Did Mr. Podhaskie 23 initiate the conversation or did you? 24 MS. TESKE: Object to the form. 25 You can answer.</p> <p style="text-align: right;">Page 66</p>	<p>1 about a legal document? 01:07 2 MS. TESKE: She's already 3 testified that she did. She already 4 testified that she brought these 5 documents to him. I'm not going to allow 6 the witness to divulge infor- -- 7 MR. GREIM: That was the difficult 8 conversation. That's the question. 9 That's the key. That's when she handed 10 him the documents. This conversation 11 happened earlier, that's what I'm asking 12 about. 13 Q. And so my -- 14 MS. TESKE: We don't -- 15 Q. My question is, in the conversation 01:08 16 where you said you heard from Daniel something was 17 going on with ACA -- let me ask you. That was not 18 the conversation where you gave him these documents, 19 was it? 20 A. It was not. 21 Q. So in the conversation where Daniel 22 said something was going on with ACA, did you come -- 23 did you start that conversation with Podhaskie and 24 come to ask him a question or did Podhaskie come to 25 you?</p> <p style="text-align: right;">Page 68</p>
<p>1 A. I'm not clear about what conversation 01:06 2 we're talking about. 3 Q. Okay. You began to tell us a few 4 minutes ago that you heard from Daniel something was 5 going on with ACA. That's the conversation I'm 6 talking about. 7 So my question to you is, did you 8 initiate that conversation or did Mr. Podhaskie? 9 MS. TESKE: Okay. Object and 10 direct the witness not to answer, and I 11 don't know that if that specific 12 conversation was a follow-up on a 13 previous conversation that they had, and 14 I do not know enough to allow the 15 witness -- again, we are talking about 01:07 16 Golden Spring's employee who went to the 17 only attorney she knows, her Golden 18 Spring's attorney, to talk about 19 something related to a legal case or a 20 legal document. I'm not going to allow 21 the witness -- 22 MR. GREIM: Actually, that was not 23 the witness's testimony, but I will ask 24 you that now. 25 Q. Did you go to Mr. Podhaskie to ask him</p> <p style="text-align: right;">Page 67</p>	<p>1 MS. TESKE: Okay. Object. Direct 01:08 2 the witness not to answer. 3 The only way I am going to get 4 comfortable with the witness answering 5 these questions is if I know more about 6 what those conversations entailed, and I 7 don't -- and that conversation can't 8 happen on the record. 9 MR. GREIM: Okay. 10 MS. TESKE: I need to step out 11 with the witness so I can understand the 12 full scope of what is going on so I 13 can -- 14 MR. GREIM: Okay. Let's go ahead. 15 Let's all refresh in our minds. You know 01:09 16 what? Actually we will come back to it. 17 We'll do that at the end with a bunch of 18 other stuff. Okay, let's put a place 19 mark on this and we'll come back to it. 20 BY MR. GREIM: 21 Q. But let me come back to my question, 22 though, because I don't -- I think you began to 23 answer it talking about this discussion, so now I'm 24 just going to ask you, why did you decide to resign 25 as a director of ACA on July 26th?</p> <p style="text-align: right;">Page 69</p>

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<p>1 MS. TESKE: And I'm going to 01:09</p> <p>2 caution you not to reveal any</p> <p>3 communications that you had with</p> <p>4 Mr. Podhaskie.</p> <p>5 A. Can you repeat your question, please.</p> <p>6 Q. Why did you decide to resign as an ACA</p> <p>7 director on July 26th?</p> <p>8 A. I did not want to get involved in</p> <p>9 things that I'm not involved with.</p> <p>10 Q. What are those things?</p> <p>11 A. To be honest, I don't know.</p> <p>12 Q. Is it -- are you referring to this</p> <p>13 case?</p> <p>14 A. I don't know anything about this case.</p> <p>15 To be honest, I don't even know why I'm here. The 01:10</p> <p>16 reason why I worked for this company, why I trust</p> <p>17 William is because we share a mission. That's what</p> <p>18 makes me trust him and that's probably why he trusts</p> <p>19 me.</p> <p>20 Anything else, what he does, who he is,</p> <p>21 his family, I don't know. I don't care. We're</p> <p>22 trying to work to make China a better place and</p> <p>23 that's all that matters.</p> <p>24 Q. Why did you think that resigning from</p> <p>25 ACA as a director would keep you from getting</p> <p style="text-align: right;">Page 70</p>	<p>1 Q. What are the things that you don't want 01:12</p> <p>2 to be involved in?</p> <p>3 MS. TESKE: Object to the form.</p> <p>4 You can answer.</p> <p>5 A. I don't know.</p> <p>6 Q. But whatever they were, they were</p> <p>7 serious enough for you to resign from ACA?</p> <p>8 MS. TESKE: Object to the form.</p> <p>9 You can answer.</p> <p>10 MR. GRENDI: Object to the form.</p> <p>11 A. I don't know.</p> <p>12 Q. You just testified a second ago that</p> <p>13 you trusted Mr. Je because you shared a mission of</p> <p>14 making China a better place, right?</p> <p>15 A. That's correct. 01:13</p> <p>16 Q. And is that the mission you thought ACA</p> <p>17 had?</p> <p>18 A. No. I trust him as a person as I know</p> <p>19 that he shares the same idea about the Communist</p> <p>20 Party and how bad they are. I am not talking about</p> <p>21 ACA or any other thing. I was talking specifically</p> <p>22 about him as a person.</p> <p>23 Q. So what is the thing you were trying to</p> <p>24 keep from getting involved in by resigning as a</p> <p>25 director?</p> <p style="text-align: right;">Page 72</p>
<p>1 involved in things that you don't want to be involved 01:11</p> <p>2 in?</p> <p>3 MS. TESKE: Object to the form.</p> <p>4 You can answer.</p> <p>5 A. Can you repeat your question, please.</p> <p>6 MR. GREIM: I'll have the court</p> <p>7 reporter do that.</p> <p>8 (Whereupon, the record is read.)</p> <p>9 A. I'm not sure I understand the question.</p> <p>10 Q. You told me a few minutes ago that you</p> <p>11 resigned from ACA because you did not want to get</p> <p>12 involved in things that you don't want to be involved</p> <p>13 in. Do you remember that testimony?</p> <p>14 MS. TESKE: Object to the form.</p> <p>15 You can answer. 01:11</p> <p>16 A. Yes.</p> <p>17 Q. And so, my question is, why did you</p> <p>18 think that resigning as a director of ACA would</p> <p>19 accomplish that goal?</p> <p>20 MS. TESKE: Object to the form.</p> <p>21 You can answer.</p> <p>22 A. Let's put it this way. You are part of</p> <p>23 a company or you work in a store. There are things</p> <p>24 in the store that you don't want to get involved</p> <p>25 with. You resign. You're not part of it any more.</p> <p style="text-align: right;">Page 71</p>	<p>1 MS. TESKE: Object to the form. 01:13</p> <p>2 You can answer.</p> <p>3 A. I don't know. I don't know</p> <p>4 specifically what's going on here with these -- with</p> <p>5 any company. I just feel that I don't want to be</p> <p>6 involved in something that does not belong to me.</p> <p>7 Q. What did you learn that made you decide</p> <p>8 that you did not want to be involved in ACA as of</p> <p>9 July 26th?</p> <p>10 MS. TESKE: Object to the form.</p> <p>11 You can answer.</p> <p>12 A. Really nothing.</p> <p>13 Q. Was it something Mr. Podhaskie told</p> <p>14 you?</p> <p>15 MS. TESKE: Object to the form, 01:14</p> <p>16 and -- object to the form.</p> <p>17 You can answer without giving away</p> <p>18 any substance of communications.</p> <p>19 A. Yes.</p> <p>20 Q. So it's something Mr. Podhaskie told</p> <p>21 you but you can't tell us what that thing is; is that</p> <p>22 your testimony today?</p> <p>23 MS. TESKE: Because I'm directing</p> <p>24 her not to.</p> <p>25 MR. GREIM: Well, okay. So you're</p> <p style="text-align: right;">Page 73</p>

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<p>1 MR. GREIM: In 2019. 02:14</p> <p>2 MS. TESKE: Relating to her</p> <p>3 services?</p> <p>4 MR. GREIM: Relating to personal</p> <p>5 services.</p> <p>6 MS. TESKE: Personal services?</p> <p>7 MR. GREIM: Services, any</p> <p>8 services.</p> <p>9 MS. TESKE: Provided to ACA.</p> <p>10 MR. GREIM: Well, first provided</p> <p>11 to ACA.</p> <p>12 MS. TESKE: Maybe rephrase the</p> <p>13 question.</p> <p>14 MR. GREIM: Yeah, I'm sorry.</p> <p>15 MR. GREIM: That's a bad one. 02:15</p> <p>16 MR. GREIM: I'm sorry. I'm</p> <p>17 thinking about -- I'm trying to cut out</p> <p>18 arts and crafts or, you know, artwork or</p> <p>19 something, tangible things.</p> <p>20 Let me go back, okay, and make it</p> <p>21 clear.</p> <p>22 BY MR. GREIM:</p> <p>23 Q. In 2019, have you received payment for</p> <p>24 any services other than your salary as a director of</p> <p>25 ACA?</p> <p style="text-align: right;">Page 102</p>	<p>1 THE WITNESS: Thank you. 02:16</p> <p>2 MS. TESKE: Thank you,</p> <p>3 Ms. Maistrello.</p> <p>4 THE VIDEOGRAPHER: This will</p> <p>5 conclude Video No. 2 and end the</p> <p>6 deposition of Karin Maistrello. We are</p> <p>7 off the record at 2:15 p.m., August 23rd,</p> <p>8 2019.</p> <p>9 (Time noted: 2:15 p.m.)</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 104</p>
<p>1 MS. TESKE: Object to the form. 02:15</p> <p>2 You can answer the question.</p> <p>3 Q. I'm sorry. Other than your salary as</p> <p>4 an employee of Golden Spring?</p> <p>5 MS. TESKE: Object to the form.</p> <p>6 But you can answer the question.</p> <p>7 A. No, I did not.</p> <p>8 MR. GREIM: Okay. Well, I want to</p> <p>9 stand on the questions I asked about the</p> <p>10 discussion with Mr. Podhaskie. I think</p> <p>11 I've asked every possible question that</p> <p>12 can be asked about that question, and I</p> <p>13 want to hold open the deposition for that</p> <p>14 purpose only.</p> <p>15 I will say that for efficiency 02:15</p> <p>16 sake, if there is a way to get the</p> <p>17 information we need from ACA without</p> <p>18 going into that, then we will try. We</p> <p>19 will try. But if we can't, we'll want to</p> <p>20 return to this topic and we'll just raise</p> <p>21 it with the judge. And so I've got</p> <p>22 nothing else.</p> <p>23 MS. TESKE: Thank you.</p> <p>24 MR. GREIM: Thank you very much.</p> <p>25 MR. GREIM: Thank you, Ms. Maistrello.</p> <p style="text-align: right;">Page 103</p>	<p>1 ACKNOWLEDGMENT</p> <p>2</p> <p>3 STATE OF NEW YORK )</p> <p>4 ) ss.:</p> <p>5 COUNTY OF _____ )</p> <p>6</p> <p>7 I, KARIN MAISTRELLO, hereby</p> <p>8 certify that I have read the transcript</p> <p>9 of my testimony taken under oath, on the</p> <p>10 23rd day of August, 2019; that the</p> <p>11 transcript, except as noted in any</p> <p>12 attached errata sheet(s), is a true</p> <p>13 record of my testimony.</p> <p>14</p> <p>15 _____</p> <p>16 KARIN MAISTRELLO</p> <p>17 Subscribed and sworn to before me</p> <p>18 this ____ day of _____, 20____.</p> <p>19</p> <p>20 _____</p> <p>21 Notary Public</p> <p>22</p> <p>23 My Commission expires the</p> <p>24 ____ day of _____, 20____.</p> <p>25</p> <p style="text-align: right;">Page 105</p>

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Karin Maistrello  
August 23, 2019

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<p>1 CERTIFICATE</p> <p>2</p> <p>3 STATE OF NEW YORK )</p> <p>4 ) ss.:</p> <p>5 COUNTY OF WESTCHESTER )</p> <p>6</p> <p>7 I, KATHLEEN T. KEILTY, a Certified</p> <p>8 Shorthand Reporter and Notary Public within</p> <p>9 and for the State of New York, do hereby</p> <p>10 certify:</p> <p>11 That KARIN MAISTRELLO, the witness whose</p> <p>12 testimony is hereinbefore set forth, was duly</p> <p>13 sworn/affirmed by me before testifying and</p> <p>14 that the foregoing transcript is a true record</p> <p>15 of said testimony.</p> <p>16 I further certify that I am not related</p> <p>17 to any of the parties to this action by blood</p> <p>18 or marriage, and that I am in no way</p> <p>19 interested in the outcome of this matter.</p> <p>20 IN WITNESS WHEREOF, I have hereunto set</p> <p>21 my hand this 4th day of September, 2019.</p> <p>22</p> <p>23 _____</p> <p>24 KATHLEEN T. KEILTY, C.S.R.</p> <p>25 License No. 000755</p> <p style="text-align: right;">Page 106</p>																																		
<p>1 ERRATA SHEET</p> <p>2 Page ____ of ____</p> <p>3</p> <p>4 I, KARIN MAISTRELLO, wish to make the following</p> <p>5 changes to the foregoing transcript of my testimony</p> <p>6 taken on the 23rd day of August 2019, for the reasons</p> <p>7 cited below:</p> <table border="1"> <thead> <tr> <th>PG-LN</th> <th>CHANGE FRM/TO</th> <th>REASON</th> </tr> </thead> <tbody> <tr><td>8</td><td>_____</td><td>_____</td></tr> <tr><td>9</td><td>_____</td><td>_____</td></tr> <tr><td>10</td><td>_____</td><td>_____</td></tr> <tr><td>11</td><td>_____</td><td>_____</td></tr> <tr><td>12</td><td>_____</td><td>_____</td></tr> <tr><td>13</td><td>_____</td><td>_____</td></tr> <tr><td>14</td><td>_____</td><td>_____</td></tr> <tr><td>15</td><td>_____</td><td>_____</td></tr> <tr><td>16</td><td>_____</td><td>_____</td></tr> <tr><td>17</td><td>_____</td><td>_____</td></tr> </tbody> </table> <p>18 _____</p> <p>19 KARIN MAISTRELLO</p> <p>20 Subscribed and sworn to before me</p> <p>21 this ____ day of _____, 20 ____.</p> <p>22</p> <p>23 _____</p> <p>24 NOTARY PUBLIC</p> <p>25 My Commission expires the ____ day</p> <p>of _____, 20 ____.</p> <p style="text-align: right;">Page 107</p>	PG-LN	CHANGE FRM/TO	REASON	8	_____	_____	9	_____	_____	10	_____	_____	11	_____	_____	12	_____	_____	13	_____	_____	14	_____	_____	15	_____	_____	16	_____	_____	17	_____	_____	
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